

Russell Greer
1100 Dumont Blvd
Apt 139
Las Vegas, NV 89169
801-895-3501
russmark@gmail.com
Pro Se Litigant

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JANE DOE,

Plaintiff

v.

LOMBARDO ET AL,

Defendants

**PROPOSED INTERVENOR'S RESPONSE
TO DOC 145**

Case No.: 3:24-cv-00065-MMD-CSD

Proposed Intervenor Russell Greer comes now and responds to ECF 145 (Plaintiff's Motion for Reconsideration) and says:

Plaintiff directly mentioned Intervenor as "the sex buyer trying to uncover Jane Doe's identity." (ECF 145, Page 5). Plaintiff says the evidence is in Intervenor's own filings. *Id.* Since Plaintiff directly mentioned Greer, he feels he has a right to respond.

Intervenor strongly says this is FALSE.

Greer doesn't care who Jane Doe is. He has zero clue whom she is. He just cares about the integrity of the law being followed and that attorneys don't create violence and hysteria. Mr. Guinasso, as demonstrated in Greer's filings, is clearly guilty of that and it needs to stop. Two brothels have been burned down. If nothing is done to stop this lawyer, by this Court and the Nevada State Bar, then, as Intervenor explained, those burnings will escalate to much worse things by members of the public.

As an unashamed sex buyer, as an advocate for the Nevada brothels and as a business person trying to open a brothel, it scares Greer that a gullible member of the public will go up behind Intervenor and shoot him in the back of the head for doing a legal activity that has been demonized by Guinasso and his band of fellow Christian lawyers. That's why Greer intervened because County Defendants have been the only Defendants to suggest sanctions against opposing counsel.

Asking Around to See If Jane Doe's Story Lined Up

Plaintiff's lawyers are trying to twist Intervenor's statement of asking around in his Judicial Notice as something other than what it was meant to convey.

First let's look at what Intervenor wrote. This is what Intervenor wrote in his Motion for Judicial Notice on 9-10-24:

"As a note to this Court: Jane Doe's complaint says she worked at Bella's in 2020 and that she's an African American woman. Proposed intervenor asked around to sex workers

working at Bella's during that time and no sex workers could remember an African American woman who was bouncing around brothels. So that's why before any finding of standing is made, Jane Doe needs to reveal herself because even workers in the industry have no idea who this person is." (ECF 121, Page 4).

The "note to the Court" was just trying to show that Jane Doe's story is bull crap. Pardon Intervenor's language. Nobody at the brothels she worked at remembers her. Nowhere did Greer say that he was trying to unmask her. He was simply doing his own research to see if what she was saying even happened.

Greer is a licensed paralegal with the Nevada State Bar, Paralegal Division. Is that not what legal professionals do is ask co-workers and witnesses to see if a complaining party's story is true? Or are Plaintiff and her lawyers expecting this Court and the Public to believe her story without any evidence? It's unfair for the Brothel Defendants to face extreme allegations without even knowing who this Phantom Jane Doe is. It's unfair to Greer's advocacy for county commissioners to swallow Jane Doe's story and oppose legislation in their counties, based on the wild allegations of a Jane Doe.

For Ms. Price (lawyer filing the Motion for Reconsideration) to even say that Greer is trying to put Jane Doe's life in jeopardy by unmasking her is utter nonsense and only plays into the dishonesty these "Christian" lawyers are doing. Again, Greer doesn't even want to unmask her other than for there to be honesty and integrity.

If she truly suffered what she claims she suffered, then she can freely unmask herself and naturally, witnesses will come forward to say what she said was true or not.

Straw Man to Divert from Jane Doe's Problematic Case

Greer believes Plaintiff mentioned his Note as a distraction and a deflection — a straw man, if you will — because Plaintiff is trying to hide something. County Defendants had

mentioned in an earlier motion that Jane Doe might not even exist or that she might be a previous Plaintiff, in a prior Guinasso case, who was dismissed for lack of standing.¹

Further, Greer believes his “Note” comment was taken out of context to hide the fact that Jane Doe has no evidence of anything she is accusing Defendants of. No photos, no receipts, no recordings. Just an affidavit. Anybody can write an affidavit. In fact, Greer can provide this Court 100 affidavits of current and past Nevada brothel sex workers who can disprove everything Jane Doe has said.

Conclusion

It is belittling and hurtful for Plaintiff to twist a paragraph in a Motion that simply stated that nobody even knows who this Jane Doe is and it’s unfair for Greer’s advocacy to be derailed because people like Jane Doe can spread lies without any proof. Greer reaffirms that he is in contact with very real women who are in the Nevada brothels by their own free will and who are willingly to appear at a hearing or through affidavit and rebut Plaintiff and her lawyers.

Respectfully

DATED: November 1st, 2024

Russell Greer

Pro Se

¹ Intervenor doesn’t have access to PACER at the moment and so he can’t look up the exact ECF where County Defendants said that.

CERTIFICATE OF SERVICE:

Pursuant to FRCP 5(b), I certify that on November 1st, 2024, I served a true and correct copy of the attached document by Electronic Mail to all attorneys.